

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 8

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<http://www.epa.gov/region08>

16 June 2000

REF: EPR-ER

Mr. William M. Corcoran
Vice President, Public and Regulatory Affairs
W.R. Grace & Co.
7500 Grace Drive
Columbia, Maryland 21044

Dear Mr. Corcoran:

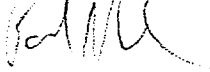
Earlier this morning I spoke with Mr. Jim Stout regarding the EPA and MDEQ comments on the draft work plan dated 6 June 2000 for work at the Export Plant at the Libby Asbestos Site in Libby, Montana. During this conversation Mr. Stout requested an extension of the due date for the submission of the revised work plan. Although I am somewhat reluctant to do so, in accordance with Section XI-Modifications of the Unilateral Administrative Order, I am extending the deadline for submitting the revised work plan until 28 June 2000. My reluctance to extend the due date stems from two thoughts. First, Grace had ample time to prepare the initial work plan, and secondly, the negotiation and planning phase of the project has taken so long that any further delays might jeopardize the completion of clean up work this summer. Nonetheless, Mr. Stout was persuasive in arguing that the extra time would be productive in the long run, in that it would allow for the submission of a work plan closer to the Agency's expectation, and would give some extra time to resolve such issues as the relocation of Mill Works West. To the extent that these two things are accomplished, I think everyone's interests will be served. However, there will be no more extensions granted regarding the work plan. If the revised work plan is still inadequate, EPA and MDEQ will either rewrite the work plan, or take over the clean up directly.

On a related matter, the UAO (in Section VI.2-Order) required that Grace designate a Contractor and Project Coordinator within two days of the effective date. Although EPA has received no formal notification as to either, we have presumed that URS-Radian is the selected Project Contractor, but are unclear if Mr. Stout is to be Grace's designated Project Coordinator. If these are indeed Grace's designations, the EPA hereby approves their selection. However, the Project Coordinator must be in a position not only to oversee the clean up, but also administer it. The Project Coordinator will be directly responsible for interfacing with the EPA, making changes in the field as directed, and generally speaking for W.R. Grace as to the conduct of the clean up. I am comfortable in dealing with Mr. Stout, and feel he is well qualified, but I am unclear with what authority he speaks on behalf of W.R. Grace. If Mr. Stout is to be the Project Coordinator, in lieu



of a statement of his qualifications as required by the UAO, please clarify his level of authority so the EPA may judge if this is satisfactory. In the future the EPA will direct all correspondence concerning the clean up to Mr. Stout, unless you chose to designate a different Project Coordinator.

Sincerely,



Paul R. Peronard
On Scene Coordinator

cc: Jim Stout, URS-Radian
John Constan, MDEQ
Ken Lund, HRO